

# FAMILY PROMISE OF GREATER DES MOINES

## Document Retention and Destruction Policy

### **Purpose**

To provide for the systematic review, retention, and destruction of documents received or created by the Family Promise of Greater Des Moines (FPGD) in connection with agency operations. This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept, and how records should be destroyed. The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate FPGD's operations by promoting efficiency and freeing up valuable storage space.

### **Document Retention**

FPGD follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule will be retained for the appropriate length of time. "Document" includes any record within the following categories in whatever form it is stored: hard copy or digitally. Records shall be placed in the custody of specific employees according to their job descriptions and administrative needs of the organization. All storage methodologies shall be tamper-proof and searchable and shall be available in a central location.

The following table provides minimum requirements. To the extent applicable laws or regulations are changed to require a different retention period, such law or regulations shall take precedence.

### **Corporate Records**

Articles of Incorporation *Permanent*  
Board Meeting and Board Committee Minutes *Permanent*  
Board Policies/Resolutions *Permanent*  
Bylaws *Permanent*  
Fixed Asset Records *Permanent*  
IRS Application for Tax-Exempt Status *Permanent*  
IRS Determination Letter *Permanent*  
State Sales Tax Exemption Letter *Permanent*  
Guest Files (after graduation) *Permanent*  
Contracts (after expiration) *7 years*  
Correspondence (general) *3 years*

### **Accounting and Agency Tax Records**

Annual Audits and Financial Statements *Permanent*  
Depreciation Schedules *Permanent*  
General Ledgers *Permanent*  
IRS 990 Tax Returns *Permanent*  
Business Expense Records *7 years*  
IRS 1099s *7 years*  
Journal Entries *7 years*  
Invoices *7 years*  
Sales Records *5 years*  
Petty Cash Vouchers, Cash Receipts, Credit Card Receipts *7 years*

### **Bank Records**

Check Registers *Permanent*

Bank Deposit Slips *7 years*  
Bank Statements and Reconciliation *7 years*  
Electronic Fund Transfer Documents *7 years*

### **Payroll and Employment Tax Records**

Payroll Registers *Permanent*  
State Unemployment Tax Records *Permanent*  
Earnings Records *7 years*  
Payroll Tax returns *7 years*  
W-2 Statements *7 years*

### **Employee Records**

Employment and Termination Agreements *Permanent*  
Retirement and Pension Plan Documents *Permanent*  
Records Relating to Promotion, Demotion or Discharge *7 years after termination*  
Accident Reports and Worker's Compensation Records *5 years*  
Salary Schedules *5 years*  
Employment Applications (persons not hired) *3 years*  
I-9 Forms *3 years after termination*  
Timesheets *7 years*  
Job postings *1 year*

### **Donor and Grant Records**

Donor Records and Acknowledgment Letters *7 years*  
Grant Applications and Contracts *Permanent*  
Grant Applications (not funded) *2 years after rejection*

### **Press Releases/Public Filings**

Press Releases *Permanent*  
Annual Reports *Permanent*  
Other Publications, Photos, Press clippings *7 years*

### **Legal, Insurance and Safety Records**

Copyright Registrations *Permanent*  
Insurance records (claims, reports and annual policies) *Permanent*  
Stock and Bond Records *Permanent*  
Trademark Registrations *Permanent*  
Leases *6 years after expiration*  
Real estate records (deeds, mortgages, sale documents) *Permanent*  
OSHA Documents *5 years*  
General Contracts *3 years after termination*  
Document destruction reports *Permanent*

### **Electronic Documents and Records**

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis.

### **Documents Containing Protected Health Information**

Protected Health Information ("PHI") is any information that is created or received by this organization, a health care provider, public health authority, insurer, or school that relates to any

past, present or future physical or mental health or condition of an individual, the provision of health care to an individual, or the payment for the provision of health care to the individual. Any documents containing PHI that are scheduled to be destroyed must be shredded. If the document can still be read after shredding, it must be re-shredded crosswise. If a document with PHI cannot be immediately destroyed or made unreadable with permanent ink, it must be placed in a secure container that is not accessible to clients, visitors or other persons not on the case management team and without permission to see the document.

### **Emergency Planning**

FPGD records will be stored in a safe, secure and accessible manner. Documents and financial files that are essential to keeping FPGD operating in an emergency will be duplicated or backed up at least every week and maintained off site.

### **Document Destruction**

Annually, the Executive Director is responsible for:

- Directing a staff review of inactive records and files that should be labeled with appropriate destruction dates and moved to long-term storage.
- Triggering a staff review of stored documents and records to determine which are eligible for destruction under this policy.
- Creating a document destruction report which lists each box or group of records meeting the appropriate criteria and circulating the report to the following for sign-off before the records are destroyed:
  - Executive Director
  - Board President
  - Board Vice President
  - Business Operations and Finance Committee
  - Consulting Accountant
  - Legal Counsel (if there are any active legal matters)
- Supervising the destruction of records which are approved for destruction.
- Reporting to the Board on the destruction process and suggestions for updates of this policy.

Any document containing financial, private or confidential information shall be destroyed using a shredder machine.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

### **Compliance**

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against FPGD and its employees and possible disciplinary action against responsible individuals. The Executive Director will periodically review these procedures with legal counsel or the organization's certified public accountant to ensure that they are in compliance with new or revised regulations.

**Apprv'd: 7/10/12**

SAMPLE